AMENDED COMPLAINT

CLERK'S OFFICE U.S. DISTRICT, COURT AT ROANOKE, VA FILED

IN THE UNITED STATES DISTRICT COURT

DEC 0 6 2023

7:23-cv-00381

Ballou	Western District of Virginia	LANGA ANSTINICA ERI	
District Judge (Assigned by Clerk's Office)	*	DEPUTY CLERK	
Sargent			

(Assigned by Clerk's Office) (Assigned by Clerk's Office)

Mag Referral Judge

For use by Inmates filing a Complaint under

CIVIL RIGHTS ACT, 42 U.S.C. §1983 or <u>BIVENS v. SIX UNKNOWN NAMED AGENTS</u> OF FED. BUREAU OF NARCOTICS, 403 U.S.C. §388 (1971)

CIVIL ACTION NO. _

saw Waleed Blake	1106405
Plaintiff Name V.	Inmate No.
Sargent T. Joseph (PSCC) 920 Old River Defendant Name & Address	Road; Pocahontas, Virginia 24635
Tikki Hicks (PSCC) 920 old River Read; Pocah Defendant Name & Address	ontas, Virginia 24635
David A. Lee (PSEC) 920 Old River Road; Pocaho Defendant Name & Address	ntas, Virginia 24635
David Bogle (PSCC) 920 Old River Road; Poca Defendant Name & Address	
Deremy S. Remines (PSC) 920 Old River Road; Defendant Name & Address	
Justin Salvers (PSCC) 920 old River Road; Defendant Name & Address	Pocahontas, Virginia 24635
IF YOU NEED TO ADD MORE DEFENDANTS, US NAME AND ADDRESS FOR I TITLE THE SECOND PAGE "CON	EACH MANIED DEL ENDINGE
生产产业企业企业企业企业企业企业企业企业企业企业企业企业企业企业企业企业企业企业	**********************
A. Where are you now? Name and Address	ess of Facility.
I saw Waleed Blake, (Wallens R	lidge State Prison/272 Dogiwood
Drive; Big Stone Gap, Virginia 24	219. (WRSP)

"CONTINUED NAMED DEFENDANTS

Bobby J. Dye (PSCC) 920 Old River Road; Pocahontas, Virginia 24635

Dusty L. Cline (PSCL) 920 Old River Road; Pocahontas, Virginia 24635

Erwin L. Browning (PSCC) 920 Old River Road; Pocahontas, Virginia 24635

Condie (PSCC) 920 old River Road; Pocahontas, Virginia 24635

J. Edmonds (PSCC) 920 old River Road; Pacahontas, Virginia 24635

Cody R. McBride (PSCC) 920 old River Road; Pocahontas, Virginia 24635

Senior Special Agent J. Wagner # 1241

Assistant Chief J. Lawson #1203

Roger Hylton (PSCC) 920 old River Road; Pocahontas, Virginia 24635

Johnson, H.E., (Institutional Investigater) (PSCC) 920 old River Road; Pocahontas, Virginia 24635

1	3. Where did this action take place?
	(PSCC) Pocahontas State Correctional Center, Pocahontas, Virginia
(C. Have you begun an action in state or federal court dealing with the same facts involved in this complaint?
•	YesXNo
	If your answer to A is Yes, answer the following:
	1. Court:
	2. Case Number:
•	D. Have you filed any grievances regarding the facts of this complaint?
	XYesNo
	1. If your answer is Yes, indicate the result:
	Defendant C. Meade upheld, that Staff did nothing wrong and she upheld Intake Decision; (unfounded).
•	2. If your answer is No, indicate why:
	E. Statement of Claim(s): State briefly the facts in this complaint. Describe what action(s) each defendant took in violation of your federal rights and include the relevant dates and places. Do not give any legal arguments or cite any cases or statutes. If necessary, you may attach additional page(s). Please write legibly.
	Claim #1 - Supporting Facts - Briefly tell your story without citing cases or law:
	On 9/13/2022, time approx, 8:40a Justin Salyers assisted in escorted
	me to RHU Fram Bravo Pod. Once in RHU Justin Salyers proceeded
â	to assault me in RHU Shower Stall Floor.
(Additiona	Claim #2 – Supporting Facts – Briefly tell your story without citing cases or law: I Supporting Facts may be placed on a separate paper titled ADDITIONAL SUPPORTING FACTS)
,	On 9/13/2022. J. Folmonds assisted escorting me to RHU and placed me into a shower stail floor where here I. Edmonds proceeded to
	Me into a shower stail floor where he; J. Edmonds proceeded to
	assault me.

E.

ADDITIONAL SUPPORTING FACTS

Claim#3- Jeremy S. Remines is complicit to Excessive use of force by spraying me excessively with his OC while I was being Choked.

Claim #4- Erwin C. Browning assisted escorting Me to RHU and also placed Me into a shower stall floor and proceeded to assault me, On 9/13/2022,

Claim 5- David Bogle assisted escurtang me to RHU and also placed me into a shower stall floor. David Bogle proceeded to cut off all my clothes, but my under clothes (Boxers) then proceeded to assault me, On 9/13/2022,

Claim#6-Cody R. McBride assisted escorting me to RHU where the proceeded to assault me on 9/13/2022, in the shower stall floor,

Claim#7- Dusty L. Cline assisted in proceeding with the assault on against me while I laid on shower floor, on 9/13/2022,

Claim #8-Sargent, Joseph T assisted escorting me off the toptier, then was relieved. When escorted to RHU Sargent proceeded to assault me as I laid on the Shower floor, on 9/13/2022, Claim#9- Roger Hylton assisted in proceeding with the assault on me while I laid on shower floor, on 9/13/2022,

Claim#10-Bobby J. Dye assisted in proceeding with the assault on me while I laid on shower floor in RHU, on 9/13/2022,

Claim #11- David A. Lee Stood in frunt of said shower stall, and watched while David Bogle Kicked/assaulted me, on 9/13/2022,

Claim #12-Tikki Hicks, while housed in RHU came to my cell one window and saw my life threatening injuries and Every ignored my plea for help and did not help me with by transporting me to Emergency room... in stead Ms. Hicks Simply shipped me to WRSP, on 4/13/2022. (WRSP) Wallens Ridge State Prison.

Claim# 13- Cordie was the Nurse who checked my restraints and injuries and Okayed me to be transferred to WRSP instead of emergency room inspite of my plea, on 9/13/2022,

Claim#14- Senior Special Agent J. Wagner # 1241, is complisit to Said assault by Ommitting inmates in Bravo Pad witness statements intentionally, on 9/13/2022,

Claim#15-Assistant Chief J. Lawson #1203, a Supervisor whom is complisit to the cover up by failure to therally Supervise / analize his senior agent report against me made on 9/13/2022,

Claim#16-(Institutional Investigator, PSCC) Johnson, H.E., is complisit to said assault by Ommitting inmates in Bravo Pod, witness statements intentionally, on 9/13/2022.

F.	State what relief you seek from the Court. Make no legal arguments and cite no cases or statutes.
	I gaux an injunction ordering WRSP Medical Staff to: Arrange
	for a qualified physician to examine my Lower Back, Mind-grain
	headaches and reason for short term memory lost. Continued -
G.	If this case goes to trial, do you request a trial by jury? Yes_X No
н.	If I am released or transferred, I understand it is my responsibility to immediately notify the court in writing of any change of address after I have been released or transferred or my case may be dismissed.
D/	ATED: 10/23/2023 SIGNATURE: 2500 Blake
the be su pr if t in a pr	Isaw Walced Blake, state that I am the plaintiff in this action, and now the content of the above complaint; that it is true of my own knowledge, except as to use matters that are stated to be based on information and belief, and as to those matters, I dieve them to be true. I further state that I believe the factual assertations are sufficient to poor a claim of violation of constitutional rights. Further, I verify that I am aware of the ovisions set forth in 28 U.S.C. §1915 that prohibit an inmate from filing a civil action or appeal, the prisoner has, on three or more occasions, while incarcerated brought an action or appeal federal court that is dismissed on the grounds that it was frivolous, malicious, or failed to state claim upon which relief may be granted, unless the prisoner is imminent danger of serious hysical injury. I understand that if this complaint is dismissed on any of the above grounds, I as be prohibited from filing any future actions without the pre-payment of the filing fees. I action under penalty of perjury the foregoing to be true and correct.

Updated 9/9/22



1. Thysa 10/24/23

"CONTINUED; RELIEF SEEK FROM THE COURT"	en werde der dem gegen gemeinte pol- vog a nacht geweigt a geweigt en
The state of the s	der seller demokratisk i sensyar syntys er sell s, se gegen er se generalsgegen ge
A. Award Compensatory damages in the amount 100,000	and the state of t
	hammadananan ya kata ki manahadalara wa kata d
Vointly and Severally against,	12.
1. Defendants, Johnson, H. E.; Tikki Hicks; David A. Lee; David Bogle;	and the state of t
Veremy S. Remines, Justin Salyers, Bobby J. Dye; Dusty L. Cline;	managaman gamar ayan ka masa aya ka masa aya aya aya aya aya aya aya aya aya
Erwin C. Browning; Cordie; J. Edmonds; Cody R. McBride;	and the second s
Roger Hylton; Senior Special Agent, J. Wagner # 1241;	
Assistant Chief, J. Lawson # 1203; and Sargent T. Joseph,	eriginaski kapina upi-milija oripakana a ninggany menim
for the physical and emotional injuries Sustained as of a	e de la companya del companya de la companya del companya de la co
result from kicking, punching, choking and ignoring plaintiffs.	e de la companya del companya de la companya del companya de la companya del la companya de la c
life - threatening injuries.	
And the second of the second o	er en
2. 10.000 Jointly and severally against Defendants, David Alee;	er (der Makkeuren Silver erspaktion ich zu bild "erspaktionen und geschlichen.
David Bogle; Sargent T. Joseph, For failure to Stop or curb the	andrian and the state of the st
physical abase sustained by plaintiff.	e mari stanget ti si digina kalangangan penggaban da a a da ji digindi. Jang
	en
3. 50.000 Jointly and Severally against Defendants, Tikki Hicks;	мецентија и подострумација
G. Holloway; H. W., Clarke; Johnson, H. E.; Senior Special Agenty	er Tallande Spring Liver Complete Spring Land (1982)
J. Wagner # 1241; Assistant Chief., J. Lawson # 1203; for failure	e.
to respond reasonably to plaintiffs serious life-threatening	d section of the sect
medical need upon notice thereof.	Milita new distance system pain of new deficiency sections.
	ngaringan kalanggayaya in hada da a sa sa sa kana sa ƙafa ay ay a sa s
·	.*

	4, 50.000 Jointly and Severally against Defendants, Tikki Hicks;
	and Cordie for failure to provide medical treatment for plaintiffs
	life-threatening injuries.
la un dannony	
	5. 10.000 Against Defendant David A. Lee for failure to
	Adequately train staff at (PSCC) Pocahontus St. Corra Center.
atom poljana	the contraction of the contracti
,	"C. Award punitive damages in the amount: 25.000
če steren sar-	
٠.	Each against;
	le Defendants, David Bogle, Cody R. McBride, Erwin C. Browning;
	Dusty L. Cline; Bobby J. Dye; Roger Hylton; Jeremy S. Remines;
	Justin Salyers; Sargent T. Joseph and J. Edmonds For punching,
	Kicking and Choking the plaintiff.
	d, of
	2. 10.000 Each against Defendants, David A. Lee; David Bogle;
Ž.,	and Suggest T. Joseph for failure to take action to stop or curb
der: 1818,1	the physical abuse against plaintiff.
94	
	3. 10.000 Each against Defendants, Tikki Hicks; David A. Lee; Surgent-
	I. Joseph; Seniar Special Agent, J. Wagner# 1241; Assistant Chief.,
	J. Lawson # 1203; Johnson, H. E., for Deliberate Indifference,
	Failure to Intervene.

	and the second s	and the same of th	1	.*
D. Grav	nt Such other relief	as it may app	pear that	-
plaintiff	is entitled.	del v - Marchine		· · · · · · · · · · · · · · · · · · ·
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	and the second s	en e	annen kalender in der eine er	— A draft w marthy whom y dilunder in
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I, Sargent_I	Losephy a Unit Manager	employed for I PSCC	, he is sued in	er - en-sekk-planet i støre.
	vidual and official Capacit		The second secon	د در
and the second s	erren artikal sampa a salahapa ka manan sa manan mataka sa sa sa sa sa sa saka sa s	iral adriadi a Fansa - Lampara Nasacipilita (Albando), Labada (Alb		-
2 Tikki Hic	ks, a Warden employed for l	(DSCC) She is stied in	half individual	
•	•	- Company and the country	Bara Marylouar	handhada, ar a sa ah dh' ya Alauna, man 1944 haya
and-offic	ial capacities,	of the second se	and the same of th	
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3. David A.1	ee, a Major employed for	(PECC), he is sued in 1	20th individual	· · · · · · · · · · · · · · · · · · ·
	d capacities,	Committee of the second of the	rection of the manufacture of the contract and accompany of the contract of th	ساميد در المسام الم المسام المسام
	and the second of the second o	in the three three and a graph to be appropriately and accommodately again	ky. An akkaragan - Panagang Kandunagan I, nagadang apagan ang ang ang ang ang ang ang ang ang	com manner should place to
4 David Bogt	ie, a Lt. employed at (PSCC)	he is sued in both in	dividual and	
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	godet i Cognimia - a la l	- marin - i i de retromospositi i i i Vista de Marine de	Montrel - Miller (in plus), Myro - In principle community, principle in a physiologic	ngalifirm) aykerii raysahi dan estiqildasi
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, ,	S. Remines, a Soft employed		in both individual	N .
and offici	al capacities, Unknown	Staff	mar market sentence of a conservation whose advances markets conservations.	den en de state de la companya de l
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	· · · · · · · · · · · · · · · · · · ·	Fun (PSCI) hair sund in	half individual	
6. Justin S	almost on Alberta Decoloring			- * **
•	alyers, an officer employed last capacities, Unknown	1		

and the same of th	"CONTINUED," PARTIES SUED
	Bobby J. Dye, an officer employed for (PSCC), he is such in both individual and official Capacities, (Unknown Staff)
8.	Dusty L. Dine, an officer employed for (PSCC), he is Sued in both individual and official capacities, (Unknown Staff)
· 9.	Erwin C. Browning, an officer employed for (PSCC), he is swed in both individual and official capacities, (Unknown Staff)
	bordie, a Nurse employed at (PSCC), shelhe is sued in both individual and official capacities,
	J. Edmonds, a sigt; employed at (PSCC), he is swed in both individual and Official capacities, (Unknown Staff)
	Cody R. McBride. a OIT engloyed at (PSCC), he is sued in both individual and official capacities,
13	J. Wagner, #1241 Senior Special Agent, he is sued in both individual and official Capacities.
	2.62 (Continued)

	"CONTINUED," PARTES SUED
	14. J. Lawson, #1203 Assistant Chief., Special Agent, he is sued in both individual and official capacities,
-	15 Roger Hylton, an officer employed for (PSCC), he is Sued in both individual and official Capacities, (Unknown Staff)
	16 Johnson, H. E., an Institutional Investigater employed for (PSCC) he is Sued in both individual and official Capacities.
	F. TRUE IDENTIES OF DEFENDENTS
	1. Please Amend the clocket to reflect that J. Watts true identity is David A. Lee,
6	2. Please Amend the docket to reflect that Wade, D.R., true identity is David Bogle,
	3. Please Amend the docket to reflect that defendant Teke Hicks is Spelled, "Tikki Hicks."
-	

~ Certificate Of Service ~

I, I saw Waleed Blake #1106405 do hereby swear Under penalty of Perjury State that on; 10/24/2023
I did mail a Notarized Copy of Amended Compraint to Parties: United States District Court; Office of the Clerk., 210 Franklin Road.; Room 540, Roomoke, VA 24011.

However the copy of the Amended Complaint was not Complete with, Defendants Swed Parties Swed, Dated, ~ 10/23/23.

Please admit this Notarized Copied, of Amended ~ Complaint... detailing; farties Sued, True Identities of Defendants, John Doe's and Unknown Staff Members, Relief Plaintiff Seek from Court, Supporting facts / Statement of Claims, Grievance in regards to facts of Complaint, Location where Action took place and Name and Address for each Named Defendant.

Isaw Walced Blake #1106405 WRSP

Date: 10/29 /2023

272 Dogwood Drive Bigstone Gap, Virginia 24219 Signature Draw Both

Isaw Waleed Blake # 11064. Wallens Ridge State Prison 272 Dogwood Drive Bigstone Gap, Virginia 24219 CEKTIFIED WATE



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United States District Court
Office Of The Clerk.,
210 Franklin Road; Sim, Room 540
Roanoke, Virginia 24011

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Mail 2 out - 10/29/2023

Bertified Mail